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Attorney for Debtor

**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
**SAN FERNANDO VALLEY DIVISION**

In re:	)	Case No.: 1:22-bk-10283-MB
	)	Chapter 7
LUSINE CRISTINE DOKUZYAN,	)	
	)	<i>EX PARTE</i> MOTION FOR ORDER TO
Debtor.	)	CONTINUE HEARING ON DEBTOR'S
	)	MOTION FOR PROTECTIVE ORDER
	)	
	)	<b><i>Proposed Hearing Date</i></b>
	)	<b>August 31, 2022 at 2:30 p.m.</b>
	)	
	)	<i>(No Hearing Required on Ex Parte)</i>

**TO THE HONORABLE MARTIN BARASH, U.S. BANKRUPTCY JUDGE:**

Debtor Lusine Dokuzyan ("Debtor") files this *Ex Parte Motion for Order to Continue Hearing on Debtor's Motion for Protective Order* ("Ex Parte Motion").

Debtor is also the Defendant in a related adversary proceeding *Hovanes John Tonoyan v. Lusine Cristine Dokuzyan*; Adv. No. 1:22-ap-01028-MB. At the moment, there are three separate matters set for hearing at different times in both the instant bankruptcy case and the underlying adversary proceeding. All three matters are closely aligned with respect to the subject matter and parties involved. These three matters include the

following:

- Defendant's Motion to Dismiss Adversary Proceeding ("Motion to Dismiss") [Adversary Docket # 3] scheduled for on August 31, 2022 at 2:30 P.M.
- Adversary Case Status Conference ("Status Conference") set for August 31, 2022 at 1:30 p.m., and
- Defendant/Debtor's "*Motion for Protective Order and Opposition to Chapter and Trustee's Intention to release Documents*" ("Protective Motion") [Bankruptcy Docket # 20] scheduled for August 24, 2022, at 11:00 A.M.

On July 15, 2022, Debtor filed an *Ex Parte Motion for Order to Combine the Hearings Set for the Following: Defendant's Motion to Dismiss; Defendant's Motion for Protective Order; Case Status Conference* [Adversary Docket # 7]. However, since the Protective Motion was filed in the instant bankruptcy case, the Court has instructed Debtor to file a separate *Ex Parte Motion* continuing the hearing.

All three matters involve the same parties – Debtor and Creditor/Plaintiff Hovanes Tonoyan. The subject matter is also interrelated. It would be most economical and expeditious for all parties, including the Court, if the hearing date and time for all three matters were set together for August 31, 2022 at 2:30 p.m. (hearing time for Motion to Dismiss). This will allow the Court to adjudicate all three matters together instead of three separate times. The Court has authority to grant this Ex Parte Motion under Bankruptcy Code §105(a) and FRBP 9006(b).

If the Court grants the Ex Parte Motion, counsel for the Defendant will promptly recirculate notice to all parties, including the notice of Zoom hearing.

Respectfully submitted,

Date: July 15, 2022

  
**Sevan Gorginian, Esq.**  
Counsel for Debtor

**PROOF OF SERVICE OF DOCUMENT**

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: **450 North Brand Boulevard, Suite 600, Glendale, CA 91203**. A true and correct copy of the foregoing **EX PARTE MOTION FOR ORDER TO CONTINUE HEARING ON DEBTOR'S MOTION FOR PROTECTIVE ORDER** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner indicated below:

**I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF")**

– Pursuant to controlling General Order(s) and Local Bankruptcy Rule(s) ("LBR"), the foregoing document will be served by the court via NEF and hyperlink to the document. On **7/15/2022** I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email address(es) indicated below:

Amy L Goldman (TR)

marisol.jaramillo@lewisbrisbois.com, AGoldman@iq7technology.com;ecf.alert+Goldman@titlexi.com

Sevan Gorginian on behalf of Defendant Lusine Cristine Dokuzyan

sevan@gorginianlaw.com, 2486@notices.nextchapterbk.com;ani@gorginianlaw.com

United States Trustee (SV)

ustregion16.wh.ecf@usdoj.gov

**II. SERVED BY U.S. MAIL:** On **7/15/2022** I served the following person(s) and/or entity(ies) at the last known address(es) in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

**7/15/2022**

**Ani Minasyan**

**/s/Ani Minasyan**